

COMMENTS OF GREATER MEDIA DETROIT (WCSX, WMGC, WRIF)

A. INTRODUCTION

Greater Media Detroit operates three FM radio stations: WCSX, licensed to Birmingham, Michigan, and WMGC and WRIF, each licensed to Detroit. We strive to provide programming that is responsive to the unique interests and needs of the greater Detroit community. Our comments below address specific issues raised in the Commission's Notice of Inquiry.

B. COMMUNITY PROGRAMMING AND PUBLIC AFFAIRS

Greater Media Detroit has found that through a combination of self-designed ascertainment procedures, listener and community outreach, and an open line of communication with our listeners, our stations are well-informed about the interests and concerns of the communities we serve. Responding to these interests and concerns is a critical component in attracting and maintaining a loyal listener base, which is in turn critical to our success in generating advertising revenue.

Our stations engage in a multi-pronged approach to determine the problems, needs, and interests of their communities. First, the stations regularly solicit input from listeners regarding issues of interest and importance to the community, both through on-air announcements and on the station websites. Listener suggestions are communicated by e-mail, regular mail, and phone. (E-mail received from listeners is answered by the stations' program directors whenever possible, while direct e-mail to on-air personalities is answered by the specific addressee. Any e-mail relating to a station's operations is duly forwarded to the station's public file.) Second, our stations conduct regular polls and research on their websites, including seeking listener opinions about news and public affairs programming and events. Third, our stations invite community leaders to suggest topics of importance to their constituents, or ask station members to participate in local community organizations to get a better idea of local concerns. In addition, station management and on-air personnel regularly monitor a number of news sources for topics of importance and for breaking news.

Each of our stations broadcasts daily programming that provides current news, weather, and traffic information. This information is obtained from local and national services, as well as in-house monitoring of major news sources, and is delivered by local on-air personnel. News updates generally are broadcast every hour during prime morning drive hours, an average of 20 reports per station per week; weather and traffic are aired more frequently. Many stations include afternoon updates, stock reports, and breaking news. News reports offer listeners up-to-the-minute information on local, national and international events, and also focus on issues of concern to our listeners, including the economy, environment, health, and lifestyle. Each report is live, delivered with the latest weather forecast and current weather conditions. News reports also include information on sports events of interest to the local community. Our investment in this type of news reporting is substantial: local news reporting for our three stations has an annual value of over \$500,000.

Our traffic reports provide listeners with the latest information on accidents, road hazards and slowdowns, and offer alternative routes around problem areas. Reports cover major transportation routes in and around the metropolitan area and, if applicable, also covers routes used for interstate travel between adjacent states. Traffic reports occur frequently during the peak morning drive hours and occasionally during afternoon drive as needed.

In addition, each station broadcasts weekly public affairs programming that addresses specific topics of interest to the community. Although the majority of our public affairs programming is produced locally in the station's community, we find that our listeners have many interests and concerns that are more universal. For this reason, our public affairs programming includes nationally syndicated programs that address specific issues of concern to our audience, such as women's health, parenting, and financial planning. We believe these programs provide important and current information that may not otherwise be readily available to our listeners. Examples of Greater Media Detroit's public affairs programming include:

 Ask the Professor, a 30-minute program produced by the University of Detroit Communications Department, consists of a rotating panel of University professors answering questions submitted by the radio audience via mail. Each show addresses numerous Detroit community concerns including the economy, the environment, race relations, media, health, science, business and labor.

 CounterSpin, a 30-minute program produced by Fairness and Accuracy in Reporting (FAIR), provides our listeners with an analysis of how the news is presented. Guests discuss media bias, whether based on race, class, gender or other factors, which deters from the objective presentation of news about current events and contemporary topics.

 The Peter Werbe Show, a one-hour program written, produced and hosted by Greater Media Detroit's Public Affairs Director, expressly addresses issues of public concern as determined by our ongoing process of ascertainment. Each week, Mr. Werbe interviews community leaders, experts in a variety of fields, authors, government officials, media personalities, charity and volunteer workers, and people working in various organizations to improve community and political life. These interviews also serve as part of the process for collecting the views of the guests for future shows.

In addition, WMGC broadcasts Living For You, a 30-minute program that explores issues surrounding women's physical, mental and emotional health. The host, Mary Rahmann, shares her vast knowledge with the audience, and also talks with many health leaders, authors and experts to keep women up to date on these issues. (Women comprise the majority of WMGC's audience.) WRIF broadcasts Night Call, a weekly two-hour program written, produced and hosted by Peter Werbe at WRIF-FM. Various guests and community leaders discuss key issues affecting the Metro Detroit area, such as electronic voting, race relations, the economy, and the workplace.

Our stations also include regular and periodic programming features designed to connect and inform their listeners with and about local events of interest, such as:

 Michigan Humane Society Pet of the Week. Each Tuesday, Jim Harper and The Magic Morning Show promote animal adoption through the Michigan Humane Society by featuring a different pet each week.

 Pledge Program. Each weekday, The Magic Morning Show features a different area school reciting the pledge of allegiance. A patriotic song follows the pledge.

 Magic family helps Military families. Magic 105.1 along with Jim Harper & the Magic Morning show held an all day live broadcast on June 25th, 2004 to collect money and special items to benefit the 127th Wing Family Readiness & Support Services department at Selfridge Air National Guard Base.

This Support Services program is an outreach center which provides a variety of services that helps troops and their families while they are away from home.

 Nurses Week. Magic 105.1 holds this event annually to honor the nurses in the Metro Detroit area for their hard work, compassion and dedication in the health care industry. Each day for one week Jim Harper and the Magic Morning Show broadcasts live from a different location. This year, we honored St. Joseph Mercy of Macomb in Clinton Township, Providence Hospital, St. Joseph Mercy-Oakland, St. John Hospital/Medical Center and Beaumont Hospital.

Our stations air dozens of public service announcements (PSAs) each week, including announcements relating to health, education, community events, and fundraisers. PSAs run in all dayparts, approximately two to four times per day. PSAs are not conditioned on the purchase of paid advertising. In the last quarter alone, for example, WCSX ran PSAs for the following organizations:

 Mentors Plus
 Jewish Vocational Foundation
 American Diabetes Foundation
 Michigan Leukemia Foundation
 Children's Center of Detroit
 Detroit Historical Museum
 Girlstown
 Michigan Kidney Foundation
 United Way
 Autistic Children's Treatment Network
 Arthritis Foundation
 Northeast Guidance Center
 Michigan Opera Theatre
 AIDS Walk - Detroit
 American Red Cross
 Visiting Nurse Association
 Detroit Symphony Orchestra
 TasteFest
 Mamon Ride for Children
 Michigan Employment Security Commission
 RideShare

C. POLITICAL PROGRAMMING

Greater Media Detroit's radio stations are devoted to promoting political and civic discourse in the Detroit community. Examples of our political programming include:

 WMGC invited the Kerry and Bush campaigns to participate in a town hall meeting, to be broadcast live from Wyandotte, Michigan, to discuss issues of concern to women. Unfortunately, the president and his surrogates declined to participate, so the event was cancelled.

 The morning show on WRIF frequently discusses local news topics, such as the potential indictment of a city councilwoman and an investigation into the Detroit police department. The morning show hosts offer commentary on these events and share listener opinions on-air.

D. EMERGENCY PROGRAMMING

All of our stations are equipped for EAS broadcasts, although we welcome further discussion on this topic. All of our stations participate in local "Amber Alerts" to assist local authorities in locating missing children. Regular programming is interrupted to broadcast these alerts.

In addition, our stations respond to local emergencies as required or appropriate under the circumstances. For example, during the 2003 power outage in much of the Midwestern United States, our three stations switched from their music formats to provide constant information and guidance for listeners affected by the power failure. After the attacks of September 11th, our stations discontinued regularly scheduled programming for 48 hours to provide information and commentary from the on-air personalities, and invite on-air dialogue with the listening audience. It is our belief that this responsiveness to local and national events provides a great service and a level of comfort and community for our listeners.

E. CREATION AND SELECTION OF PROGRAMMING

Each of our stations conducts extensive local music testing to design and develop its playlists. We absolutely do not subscribe to any "national" playlists because we believe we have an obligation to play what our listeners want to hear.

For example, our stations perform an annual comprehensive review of all aspects of station programming using a strategic telephone study. Additional music tests are fielded three to four times per year. We also hold "listener advisory board" meetings at least once per quarter, during which volunteers from the station listener database are invited to the station to discuss programming policy, advertising, and all other aspects of listener satisfaction.

Our stations also use their station websites as a source of communication with and feedback from listeners. Our listeners in the Detroit area are polled on a regular basis regarding a variety of topics, including reception problems, program content and charitable projects.

Our stations also broadcast regular programming that is designed to spotlight local artists or music outside the station's format. For example, WRIF airs a weekly local music program on Sunday nights. Local bands are constantly invited to submit material for this program, and the station consistently gets a good response from local talent. WCSX broadcasts Little Steven's Underground Garage each week, highlighting unknown garage bands and other music outside our typical playlists.

We believe that digital radio and the internet can provide many opportunities to broaden our programming offerings and serve a wider audience. Digital radio offers the potential to broadcast on subchannels, on which alternative programming could be aired. The internet provides limitless opportunities to stream alternative programming, although the current CARP rulings make web streaming somewhat cost-prohibitive, particularly for experimental formats.

F. COMMUNITY ACTIVITIES

Greater Media Detroit is a firm believer that our public interest obligations do not begin and end with our programming activities. Each of our

stations is an active participant in the Detroit community, particularly with respect to sponsoring local fundraisers and bringing attention to issues of local concern and importance. For example, WCSX sponsors the annual JJ & Lynne's Stone Soup™ project, a city-wide effort in which the station's morning co-hosts coordinate a volunteer-supported restoration of a classic car (this year, a 1970 Plymouth HEMI Road Runner) to benefit the Children's Leukemia Foundation of Michigan. The 2003 project car, a restored and modified 1967 Mustang, was raffled off to raise over \$100,000. The 2004 total raised, including the 28-hour CLF Radiothon, was more than \$370,000. The station also donated over a thousand minutes of air-time to promote the project and the Children's Leukemia Foundation. In addition to the sizable cash amount that flows to the charity, WCSX has created a project that is uniquely "Detroit", developing a positive sense of community by bringing together innumerable volunteers and organizations who generously contribute their time, expertise, parts and passion to create a one-of-a-kind automobile to benefit children here in Michigan and support research with global impact.

Additional charitable projects include:

 WRIF's morning show, Drew & Mike, have established a foundation to help the families of fallen police officers and firefighters in the Greater Detroit area. To date, the foundation has donated approximately \$100,000 to this cause. The foundation also recently donated \$10,000 to support Michigan's troops serving in Iraq and Afghanistan.

 WCSX air personality Ken Calvert hosts KC's Comics for a Cause, which raised \$13,000 for Children's Hospital with a sold out comedy show at Mark Ridley's Comedy Castle.

 WRIF sponsored and hosted the 4th annual Harleyfest to benefit the Muscular Dystrophy Association, gathering over 25,000 RIFF listeners and Harley-Davidson fans at Freedom Hill on June 22nd. The day full of music, bikes and more brought the total Harleyfest tally to over \$158,000.

 WMGC's Jim Harper and the Magic Morning Show hold an annual Toys for Tots Campaign, which visits area malls with live broadcasts of the show and cooperates with the US Marines to gather toys for needy families. Last year's campaign raised over \$280,000 in toys.

 WMGC sponsored Making Strides Against Breast Cancer with the American Cancer Society. The Saturday morning walk included on-air personalities Linda Lanci and Mitzi Miles.

 WMGC sponsors the Women Who Make Magic awards, an annual Magic 105.1 event to spotlight local women within the community who have made "Magic". The stars of this year's event were 36 women nominated by Magic listeners through cards, letters and e-mails telling the stories of how these great women have touched lives within the community. The banquet was held on June 3rd, 2004 at Andiamo in Warren. Also held was a "Magic Silent Auction" with proceeds benefiting "Vista Maria" organization.

 The Thin Blue Line event was held at the Direct Optical store at Orchard Lake and 13 Mile in Farmington Hills on June 13th, 2004. Magic 105.1 invited listeners to come out and join Jim Harper, Linda Lanci, Cyndy Canty and Mike Bradley for a Police escorted scenic motorcycle ride that ended at Kensington Metropark. Registration fees were collected for this event to raise money to benefit the "Thin Blue Line of Michigan" which supports local police departments.

 WRIF held a web